

30 April 2004

Ms. Leanne Cobb  
Environmental Manager  
Teknor Apex Company  
505 Central Avenue  
Pawtucket, RI 02861

Dear Ms. Cobb:

The Department of Environmental Management, Office of Air Resources has reviewed and approved your request for revisions to the recordkeeping requirements in your minor source permit (Approval No. 1787).

Enclosed is a revised minor source permit issued pursuant to our review of your request (Approval No. 1787).

I can be reached at 222-2808, x-7011 if there are any questions concerning this permit.

Sincerely,

Douglas L. McVay  
Associate Supervising Engineer  
Office of Air Resources

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES

MINOR SOURCE PERMIT

*TEKNOR APEX COMPANY*

APPROVAL NO. 1787  
(revised April 2004)

Pursuant to the provisions of Air Pollution Control Regulation No. 9, this minor source permit is issued to:

*Teknor Apex Company*

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For the following:

*Revisions to the recordkeeping requirements in Condition C.1.*

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Located at: *505 Central Avenue, Pawtucket*

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**This permit shall be effective from the date of its issuance and shall remain in effect until revoked by or surrendered to the Department. This permit does not relieve *Teknor Apex Company* from compliance with applicable state and federal air pollution control rules and regulations. The design, construction and operation of this equipment shall be subject to the attached permit conditions and emission limitations.**

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Stephen Majkut, Chief  
Office of Air Resources

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Date of issuance

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR RESOURCES**

Permit Conditions and Emission Limitations

**TEKNOR APEX COMPANY**

**APPROVAL NO. 1787**  
(revised April 2004)

A. Emission Limitations

1. The owner/operator shall limit the total quantity of hazardous air pollutant (HAP) emissions discharged to the atmosphere from PVC Compounding Line No. 8 to comply with the facility wide limit of 18,000 pounds of any one HAP or 48,000 pounds of any combination of HAPs in any 12 month period contained in the facility's Emission Cap. "Hazardous Air Pollutant" shall mean an air pollutant that has been listed pursuant to Section 112(b) of the Clean Air Act Amendments of 1990.
2. The owner/operator shall limit the total quantity of volatile organic compound (VOC) emissions discharged to the atmosphere from PVC Compounding Line No. 8 to comply with the facility-wide limit of 98,000 pounds in any 12 month period contained in the facility's Emission Cap.

B. Operating Requirements

1. The maximum hourly production rate of PVC Compounding Line No. 8 shall not exceed 5,000 pounds per hour.
2. The annual production of PVC Compounding Line No. 8 shall be limited to a maximum of 18,000,000 pounds per year.

C. Record Keeping and Reporting

1. The owner/operator shall keep and maintain records for PVC Compounding Line No. 8 sufficient to determine actual VOC and HAP emissions on a monthly basis including, but not limited to, the following:
  - a. The total pounds of product produced on the line and the total run time of the line;

- b. The monthly amount of VOC and HAP containing additive (e.g. plasticizer, stabilizer) used in the plastics department per month multiplied by the percent of production run on Line No. 8;
  - c. The VOC and HAP content of each additive.
  - d. The total amount of dust collected per month in the dust collection systems for Line No. 8 and the quantity emitted.
2. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of VOC emissions discharged to the atmosphere from PVC Compounding Line No. 8. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
3. The owner/operator shall, on a monthly basis, no later than 15 days after the first of the month, determine the total quantity of HAP discharged to the atmosphere from PVC Compounding Line No. 8. The owner/operator shall keep records of this determination and provide such records to the Office of Air Resources upon request.
4. The owner/operator shall notify the Office of Air Resources in writing of the date of actual start-up of the modified PVC Compounding Line No. 8, no later than 15 days after such date.
5. The owner/operator shall notify the Office of Air Resources in writing of any physical or operational change to any equipment that would:
  - a. Change the representation of the facility in the application.
  - b. Alter the applicability of any state or federal air pollution rules or regulations.
  - c. Result in the violation of any terms or conditions of this permit.
  - d. Qualify as a modification under APC Regulation No. 9.

Such notification shall include:

- Information describing the nature of the change.
- Information describing the effect of the change on the emission of any air contaminant.
- The scheduled completion date of the planned change.

Any such change shall be consistent with the appropriate regulation and have the prior approval of the Director.

6. The owner/operator shall notify the Office of Air Resources of any anticipated noncompliance with the terms of this permit or any other applicable air pollution control rules and regulations.
7. The owner/operator shall notify the Office of Air Resources, in writing, of any noncompliance with the terms of this permit within 30 calendar days of becoming aware of such occurrence and supply the Director with the following information:
  - a. The name and location of the facility;
  - b. The subject source(s) that caused the noncompliance with the permit term;
  - c. The time and date of first observation of the incident of noncompliance;
  - d. The cause and expected duration of the incident of noncompliance;
  - e. The estimated rate of emissions (expressed in lbs/hr or lbs/day) during the incident and the operating data and calculations used in estimating the emission rate;
  - f. The proposed corrective actions and schedule to correct the conditions causing the incidence of noncompliance.
8. All records required in this permit shall be maintained for a minimum of five years after the date of each record and shall be made available to representatives of the Office of Air Resources upon request.

D. Other Permit Conditions

1. To the extent consistent with the requirements of this permit and applicable federal and state laws, the facility shall be designed, constructed and operated in accordance with the representation of the facility in the permit application dated 8 October 2003.
2. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter the facility at all times for the purpose of inspecting any air pollution source, investigating any condition it believes may be causing air pollution or examining any records required to be maintained by the Office of Air Resources.
3. At all times, including periods of startup, shutdown and malfunction, the owner/operator shall, to the extent practicable, maintain and operate the facility in

a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Office of Air Resources which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures and inspection of the source.

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